

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF NEW YORK

KATHLEEN PARADOWSKI, individually and  
on behalf of a class of similarly situated  
individuals,

Plaintiff,

v.

CHAMPION PETFOODS USA, INC. and  
CHAMPION PETFOODS LP,

Defendants.

Case No: 6:18-CV-01228-LEK-DEP

**DECLARATION OF REBECCA  
PETERSON IN SUPPORT OF REPLY TO  
DEFENDANTS' OPPOSITION TO  
PLAINTIFF'S MOTION FOR  
CLASS CERTIFICATION**

I, Rebecca A. Peterson, declare the following:

1. I am an attorney at the law firm of Lockridge Grindal Nauen P.L.L.P. ("LGN"). I represent Plaintiff in this matter and submit this Declaration in support of Plaintiff's Reply to Defendants' Opposition to Plaintiff's Motion for Class Certification.

2. This Declaration is based on my personal knowledge and review of my files.

3. Attached as **Exhibit 55** is a true and correct copy of an article, "Organic Turmeric Continues to be a Rising Star," published by the Organic Produce Network on March 26, 2020, available at <https://www.organicproducenetwork.com/article/1021/organic-turmeric-continues-to-be-a-rising-star>.

4. Attached as **Exhibit 56** is a true and correct copy of an article, "How We Test Our Turmeric," published by The American Turmeric Company, available at <https://www.americanturmeric.com/lab-tested-turmeric>.

5. Attached as **Exhibit 57** is a true and correct copy of an e-mail communication between Jeff Johnston, Peter Muhlenfeld, Rick Raposo, Clement Lee, and Robin Jean, dated March 12 and 13, 2013 (Bates numbered CPF1292285).

6. Attached as **Exhibit 58** is a true and correct copy of a chart identifying the number of times specific terms appear on the packaging for Acana Heritage Free-Run Poultry and Acana Regionals Meadowland.

7. Attached as **Exhibit 59** is a true and correct copy of Dr. Gary Pusillo's Rebuttal to Dr. Poppenga's Expert Report, dated December 2, 2020.

8. Attached as **Exhibit 60** is a true and correct copy of excerpts from the Deposition of Cammeo Renfro, dated July 22, 2020, in the matter *Renfro v. Champion Petfoods USA, Inc.*, No. 1:18-cv-02756-DDD-MEH (D. Colo).

9. Attached as **Exhibit 61** is a true and correct copy of excerpts from the Deposition of Jennifer Reitman, dated January 4, 2019, in the matter *Reitman v. Champion Petfoods USA, Inc.*, No. 2:18-cv-01736 (C.D. Cal.).

10. Attached as **Exhibit 62** is a true and correct copy of excerpts from the Deposition of Scott Wertkin, dated August 31, 2020, in the matter *Song v. Champion Petfoods USA, Inc.*, No. 18-cv-03205-PJS-KMM (D. Minn.).

11. Attached as **Exhibit 63** is a true and correct copy of excerpts from the Deposition of Jennifer Song, dated August 25, 2020, in the matter *Song v. Champion Petfoods USA, Inc.*, No. 18-cv-03205-PJS-KMM (D. Minn.).

12. Attached as **Exhibit 64** is a true and correct copy of excerpts from the Deposition of Erin Grant, dated June 28, 2019, in the matter *Reitman v. Champion Petfoods USA, Inc.*, No. 2:18-cv-01736 (C.D. Cal.).

13. Attached as **Exhibit 65** is a true and correct copy of excerpts from the Deposition of Tracy Knierim, dated October 7, 2020, in the matter *Shaker v. Champion Petfoods USA, Inc.*, No. 2:18-cv-13603-LJM-DRG (E.D. Mich.).

14. Attached as **Exhibit 66** is a true and correct copy of excerpts from the Deposition of Barbara McGraw, dated July 8, 2020, in the matter *Renfro v. Champion Petfoods USA, Inc.*, No. 1:18-cv-02756-DDD-MEH (D. Colo.).

15. Attached as **Exhibit 67** is a true and correct copy of excerpts from the Deposition of Carol Shoaff, dated January 3, 2019, in the matter *Reitman v. Champion Petfoods USA, Inc.*, No. 2:18-cv-01736 (C.D. Cal.).

16. Attached as **Exhibit 68** is a true and correct copy of excerpts from the Deposition of Ramy Shaker, dated October 21, 2020, in the matter *Shaker v. Champion Petfoods USA, Inc.*, No. 2:18-cv-13603-LJM-DRG (E.D. Mich.).

17. Attached as **Exhibit 69** is a true and correct copy of excerpts from the Deposition of Stefan Boedeker, dated March 16, 2021.

18. Attached as **Exhibit 70** is a true and correct copy of excerpts from the Deposition of Lorin Hitt, dated April 22, 2021.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 14, 2021, in Minneapolis, Minnesota.

/s/ Rebecca A. Peterson

Rebecca A. Peterson